

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

TANGER MANAGEMENT, LLC; TANGER COLUMBUS, LLC; and TANGER HOUSTON, LLC,

Plaintiffs and Counter-Defendants,

v.

HAGGAR DIRECT, INC. and HAGGAR CLOTHING CO.,

Defendants and Counter-Claimants.

CIVIL ACTION NO. 1:20-CV-00874-RP

**DEFENDANTS' AND COUNTERCLAIMANTS' RESPONSE TO
PLAINTIFFS' AND COUNTER-DEFENDANTS'
MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

While Defendants and Counter-Claimants Haggar Direct, Inc. and Haggar Clothing, Co. (“Haggar”) contend that all of Plaintiffs’ claims lack merit, Haggar does not oppose the relief sought in Plaintiffs’ and Counter-Defendants’ Motion for Leave to File Amended Complaint (Dkt. No. 50) (the “Motion”). Pursuant to Local Rule CV-7, if the Court grants the Motion and the clerk files the proposed First Amended Complaint (50-2), Haggar will timely respond to that pleading.

Dated: June 17, 2021

Respectfully submitted,

BUTLER SNOW LLP

By: /s/ Eric J.R. Nichols

Eric J.R. Nichols (State Bar No. 14994900)
Christopher Cowan (State Bar No. 24084975)
1400 Lavaca Street, Suite 1000

Austin, Texas 78701
Tel.: 737.802.1800
Fax: 737.802.1801
Email: eric.nichols@butlersnow.com
chris.cowan@butlersnow.com

TROUTMAN PEPPER HAMILTON SANDERS LLP

Jeremy Heep (*pro hac vice*)
Karli E. Cozen (*pro hac vice*)
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799
Tel.: 215.981.4972
Fax: 215.981.4750
Email: Jeremy.Heep@Troutman.com
Karli.Cozen@Troutman.com

*Attorneys for Haggar Direct, Inc. and Haggar
Clothing Co.*

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2021 a true and correct copy of the foregoing was served on all counsel of record via the Court's Electronic Case Filing System.

By: /s/ Eric J.R. Nichols

59705982.v1